

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,  
*Plaintiff,*

vs.

**Case No: 1:16-cr-00070-FPG**

MICHAEL BUSH,  
*Defendant.*

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**DEFENDANT'S STATEMENT WITH RESPECT  
TO SENTENCING FACTORS**

**PRELIMINARY STATEMENT**

On July 18, 2016, Michael Bush pled guilty to one count of 18 U.S.C. §875(c) in front of Chief United States District Judge Frank P. Geraci, Jr.

The Plea Agreement entered into between the parties and filed with the Court indicated that when all adjustments were taken into account, Mr. Bush's Sentencing Guideline Range would be 10, resulting in a sentencing range of six to twelve months imprisonment.

**SENTENCING GUIDELINES**

Consistent with the Plea Agreement, and with his acceptance of responsibility, Mr. Bush's adjusted offense level is 10, resulting in a Sentencing Range of six to twelve months. Mr. Bush's criminal history category is 1.

Counsel further agrees to not advocate for a sentence outside of the Sentencing Guidelines outlined in the Plea Agreement and Presentence Report, and agrees to a sentence within the Guidelines that had been previously outlined.

**CONCLUSION**

The Government has advised counsel that it does not oppose a sentence within the Sentencing Guidelines, therefore we ask the Court to sentence Mr. Bush to a sentence within the guidelines outlined in the Plea Agreement and Presentence Report.

DATED: Buffalo, New York  
September 15, 2016

Respectfully submitted,

/s/Justin D. Ginter  
JUSTIN D. GINTER, ESQ.  
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TO: BRENDAN T. CULLINANE, ESQ.  
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Buffalo, New York 14202

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***CERTIFICATE OF SERVICE***

I hereby certify that on September 15, 2016, I electronically filed the foregoing with the Clerk of the District Court using the CM/ECF system.

I hereby certify that on September 15, 2016, a copy of the foregoing was also delivered to the following via CM/ECF:

WILLIAM J. HOCHUL, ESQ.  
United States Attorney  
138 Delaware Avenue  
Buffalo, New York 14202

ATTN: BRENDAN T. CULLINANE, ESQ.  
Assistant United States Attorney

Dated: Buffalo, New York  
September 15, 2016

s/ Amanda E. Workman  
Amanda E. Workman